

ESTTA Tracking number: **ESTTA625024**Filing date: **09/03/2014**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**Notice of Opposition**

Notice is hereby given that the following party opposes registration of the indicated application.

Opposer Information

Name	MauriceD.Landers
Granted to Date of previous extension	09/03/2014
Address	1 Green Street Ste 501 Jersey City, NJ 07302 UNITED STATES

Attorney information	Darren S. Rimer Rimer & Mathewson LLP 30021 Tomas, Suite 300 Rancho Santa Margarita, CA 92688 UNITED STATES trademarks@rimermath.com Phone:9493671541
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Applicant Information

Application No	79107704	Publication date	05/06/2014
Opposition Filing Date	09/03/2014	Opposition Period Ends	09/03/2014
International Registration No.	1103024	International Registration Date	10/26/2011
Applicant	JACK AND JILL FOUNDATION LIMITED Johnstown Manor IRELAND		

Goods/Services Affected by Opposition

Class 036. First Use: 0 First Use In Commerce: 0

All goods and services in the class are opposed, namely: Charitable fundraising services; philanthropic services relating to the making of monetary grants in the field of health care; charitable monetary services, namely, accepting and administering monetary charitable grant contributions in the field of health care; charitable fundraising services by means of organization of special fundraising activities and events for health care

Grounds for Opposition

Priority and likelihood of confusion	Trademark Act section 2(d)
<i>Torres v. Cantine Torresella S.r.l.Fraud</i>	808 F.2d 46, 1 USPQ2d 1483 (Fed. Cir. 1986)

Mark Cited by Opposer as Basis for Opposition

U.S. Application/ Registration	NONE	Application Date	NONE
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tion No.			
Registration Date	NONE		
Word Mark	SHAMROCK FUND		
Goods/Services	Charitable services, namely, coordination of non-monetary contributions to charities and non-profits; Charitable fundraising services		

Attachments	opposition-part1.pdf(1709220 bytes) opposition-part2.pdf(4775678 bytes) opposition-part3.pdf(5128881 bytes) opposition-part4.pdf(617386 bytes)
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Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Signature	/Darren S. Rimer/
Name	Darren S. Rimer
Date	09/03/2014

Case LANDM-002M
Trademark Opposition

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In Re U.S. Application Serial No. 79/107,704

Maurice D. Landers,)	
)	Opposition No.
Opposer,)	
)	
vs.)	
)	
Jack and Jill Foundation Limited,)	
)	
Applicant.)	
_____)	

NOTICE OF OPPOSITION

Commissioner for Trademarks
P.O. Box 1451
Alexandria, Virginia 22313-1451

Dear Sir/Madam:

In the matter of the application of Jack and Jill Foundation Limited of Naas, Ireland (hereinafter “Applicant”) for registration of the trademark THE SHAMROCK FUND, Application Serial No. 79/107,704, published in the Official Gazette of May 6, 2014, Maurice D. Landers, an individual, with an address of 1 Greene St., Apt 501, Jersey City, NJ 07302 (hereinafter “Opposer”), believes that he will be damaged by registration of the mark shown in Serial No. 79/107,704, and hereby opposes the same.

The grounds for opposition are as follows:

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1. Opposer has been engaged in the business of offering charitable services and charitable fundraising services for many years. In connection therewith, Opposer has used, in interstate commerce, the trademark SHAMROCK FUND (hereinafter Opposer's Trademark), for the aforementioned services since prior to Applicant's filing date and date of priority in application Serial No. 79/107,704 for the mark THE SHAMROCK FUND (hereinafter Applicant's Trademark). Opposer's use of Opposer's Trademark for its services predates Applicant's filing date and date of priority alleged in Applicant's instant trademark application.

2. As a result of the continuous use of Opposer's Trademark by Opposer, such mark has become and continues to function as a valuable business and marketing asset of Opposer, and serves to indicate to the trade and consuming public the services originating from Opposer.

3. Notwithstanding Opposer's rights in and to Opposer's Trademark, Applicant, on information and belief, filed an application for registration of Applicant's Trademark on October 26, 2011. Said application was published for opposition in the Official Gazette of May 6, 2014.

4 Opposer enjoys priority of use of its pleaded trademark in the United States over any use or constructive use of the Applicant's Trademark by the Applicant.

5. Applicant's use and registration of the instant trademark will lessen or diminish the capacity of Opposer's famous Trademark SHAMROCK FUND to identify and distinguish the services offered by Opposer, regardless of whether there exists any direct competition between Opposer and Applicant, and regardless of whether there exists any likelihood of confusion, mistake or deception between Applicant's services at issue and Opposer's services. Opposer's mark has been extensively used by Opposer since at least as early as September 2011, and Opposer's Trademark is famous under the Lanham Act.

6. Applicant's Trademark is confusingly similar to Opposer's Trademark, and its registration and use by Applicant for the services claimed in the subject application is likely to cause confusion, deception and mistake.

7. Applicant's use of the instant trademark interferes with Opposer's use of Opposer's Trademark, and use of, or registration of, the instant trademark by Applicant will seriously damage Opposer.

8. Applicant has also fraudulently filed its present trademark application under Section 66(a) of the Trademark Act. That is, as part of the instant application, Applicant had to certify under penalty of perjury that to the best of its knowledge and belief, Applicant believed that the applicant was entitled to use the mark in commerce; that to the best of the Applicant's knowledge and belief no other person, firm, corporation, or association has the right to use the mark in commerce, either in the identical form thereof or in such near resemblance thereto as to be likely, when used on or in connection with the goods/services of such other person, to cause confusion, or to cause mistake, or to deceive. Applicant's declaration was patently false, making this Applicant fraudulently filed.

9. Attached hereto as Exhibit 1 is a true and correct copy of an e-mail dated September 1, 2011, from Opposer's representative, to a host of people in the Irish American community, announcing the launch of the SHAMROCK FUND.

10. Upon information and belief, Applicant received a copy of the e-mail in Exhibit 1 prior to October 26, 2011.

11. On October 16, 2011, Opposer sent an e-mail to Senator Mary Ann O'Brien and Jonathan Irwin (the CEO of Applicant), a true and correct copy of which is attached as Exhibit 2.

12. On October 17, 2011, Jonathan Irwin, the CEO of Applicant, sent an e-mail to Opposer, a true and correct copy of which is attached as Exhibit 3.

13. As reflected in Exhibits 1-3, Applicant knew at the time of filing its instant trademark application on October 26, 2011 that the Opposer was using its trademark for SHAMROCK FUND, and claiming trademark rights to the same for its charitable fundraising services.

14. In light of the foregoing, Applicant fraudulently filed its instant trademark application.

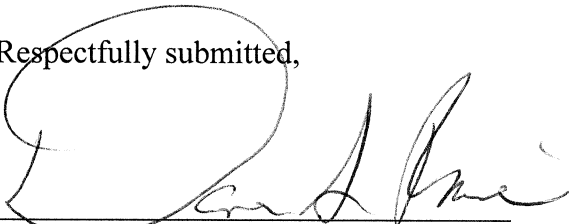
WHEREFORE, Opposer believes that he will be damaged by said registration and prays that registration of the Applicant's Trademark to Applicant be denied.

The filing fee for this Opposition has been submitted with this Notice of Opposition.

Respectfully submitted,

Date: 9/3/14

By:

A handwritten signature in black ink, appearing to read "Darren S. Rimer", written over a horizontal line.

Darren S. Rimer
RIMER & MATHEWSON LLP
30021 Tomas, Suite 300
Rancho Santa Margarita, CA 92688
(949) 367-1541

Counsel for Opposer

EXHIBIT 1

Darren S. Rimer

From: Failte32 Failte32 [failte32@gmail.com]
Sent: 05/20/2014 4:31 PM
To: darren@rimermath.com
Subject: Fwd: Shamrock Fund Launched - Applications Now Being Accepted From Those In New York On J-1 IWT Program

[REDACTED]

[REDACTED]

Very best
Maurice

----- Forwarded message -----

From: **Failte32 Failte32** <failte32@gmail.com>
Date: Thu, Sep 1, 2011 at 8:28 PM
Subject: Shamrock Fund Launched - Applications Now Being Accepted From Those In New York On J-1 IWT Program
To: marybeggan@aol.com, eamonn2064@gmail.com, joemcmanus@boardwalkpropertygroup.com, mngnyc@aol.com, pdohurley@aol.com, IrishLawyersNY@aol.com, gdoyle5@nyc.rr.com, pauline@irishartscenter.org, siobhand@eiic.org, april@irishvoice.com, gerry.murphy@enterprise-ireland.com, orla@aislingcenter.org, info@ciic-usa.org, vargo@us-irelandalliance.org, maeodriscoll@aol.com, aine@irishradio.net, lally.lally@verizon.net, jdc1916@aol.com, patriciaoreilly@outofirelandtv.com, Lorraine.Christian@dfa.ie, greg@paddedwagon.com, tammy@letitshineinc.com, slynott@century-business.com, jfavila@optonline.net, bmcnamara@irelandhsp.com, hbeirne@hotmail.com, chairman@nyc-st-patrick-day-parade.org, frankmcgreal@yahoo.com, alan.farrelly@dfa.ie, Niall.Burgess@dfa.ie, kroppyboy@aol.com, dandennehy@hotmail.com, rohanlon@irishecho.com, ebrendand1234@aol.com, michelleflahive@gmail.com, paul@newyorkirishcenter.org, irishlanguage@gmail.com, friedaklotz@googlemail.com, lturner@nibureau.com, mcmahonnaomi@hotmail.com, pat.oconnell@conallgroup.com, tim.roche@enterprise-ireland.com, ainecos2008@gmail.com, niallOLEary@ireland.com, paddy@irishexaminerusa.com, NRolf@council.nyc.gov, toddspr@yahoo.com, Laurence.McCarthy@shu.edu, AMULLEN@corcoran.com, ryagarry@gmail.com, beglin97@verizon.net, newyorkminorboardgaa@yahoo.com, cusickm@assembly.state.ny.us, irelandcalls@yahoo.com, grobes@assembly.state.ny.us, jimemsa@nyc.rr.com, paul@publicachievement.com, ecmag7@aol.com, tombeirne4@hotmail.com, fitzpatrick.brian@rocketmail.com, lizken01@msn.com, gallagherbarrett@aol.com, boyntonburkes@yahoo.com, bgandersson@records.nyc.gov, attorneymikemccabe@yahoo.com, colman@fonepool.com, Alice.OSullivan@rte.ie, Brendan.OCaollai@dfa.ie, bburke@countrybnk.com, ametcalf@tourismireland.com, omalleylaw@aol.com, garret@hkhotels.com, michaeljsmoran@gmail.com, seancorbett1990@hotmail.com, k.flynncent@gmail.com, ldnessa@hotmail.com, joe.tallon@gmail.com, sheila180689@hotmail.com, paulinemarieduggan@live.com, sharonon22@yahoo.ie, tobrien718@gmail.com, s.wynne2@nuigalway.ie, diarmuid.fullerton@studentncirl.ie, k.mcmanus4@nuigalway.ie, ciaranmceallaigh@hotmail.com, gavohanlon@gmail.com, johnpaul.costello@gmail.com, paddykjr@gmail.com, katrinadickson@hotmail.com, mhaincoulter@yahoo.co.uk, johnmcdonnell21079118@gmail.com, ciaranmurphy18@hotmail.com, clairefergus93@hotmail.com, juliekavanagh6@hotmail.com, eileenomahoney@yahoo.com, cdeignan@hotmail.com, emberboland@gmail.com, nathanbuckley01@itnet.ie, sarahmoran19@gmail.com, fi.c@hotmail.com, niallmoo2@hotmail.com, niall.omaonaigh2@mail.dcu.ie, amcostel@tcd.ie, darrenop@gmail.com, msjennifercondon@hotmail.com, poulboycurtin@hotmail.com, suzigubbins12@hotmail.com, kieranmg@live.com, killianmcnally1@hotmail.com, chrisblockley360@hotmail.com,

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stephenbyrne86@gmail.com, cassandra.lorraine@gmail.com, catherineryan90@gmail.com,
simongerrardobrien@yahoo.ie, cormac.mccabe@gmail.com, nicholakehoe@gmail.com,
doylecartoons@gmail.com, rossldillon@gmail.com, shanenolan2@gmail.com, sean.keane23@mail.dcu.ie,
lisab_xx@hotmail.com, sinead.murphy@gmail.com, orlanugent1@yahoo.co.uk, jgallagher32@qub.ac.uk,
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will@danieldromm.com, dromm@council.nyc.gov, bridgetcmckenna@yahoo.com,
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community.affairs@nyu.edu, katie.fox@ciic-usa.org, rebeccaduggan@hotmail.com,
ciara.mccarthy2@hotmail.com, maryor80@gmail.com, tadhgcrowley@hotmail.com,
aonghusms@hotmail.com, ciaranbreslin@gmail.com, deszie@gmail.com, noel.slevin@talk21.com,
shanebeltra@hotmail.com, patrickwolohan@yahoo.com, mackerpaul@hotmail.com,
amangujral1989@gmail.com, mmuldoon@irishcentral.com, gwenorel@comcast.net, ciaran@irishlobbyusa.org,
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fiotoole@tcd.ie, izziedk@hotmail.com, rmillar@iicenter.org, julieskehan@hotmail.com,
fiona.haugh5@gmail.com, nboyle500@hotmail.com, nataliedoherty@live.com,
niamh.nichonchubhair@axisballymun.ie, rdaibhis@gmail.com, maurice@aschweitzer.org,
mcarroll@iicenter.org, weemim1@hotmail.co.uk, michael.j.mellody@ml.com, JJFCO1@aol.com,
mel_deane@yahoo.com, sharondecourcey@hotmail.com, shanetcc@aol.com, johnvesey@aol.com,
employmentcoordinator@eic.org, paulfarrell13@hotmail.com, mkliche2@yahoo.com,
kvaughn@graceinstitute.org, healthyrob@gmail.com, sstorms@etreiber.com, tiernan.walsh@rht.com,

Hi everyone

We have now launched the **Shamrock Fund** SM to support longer-term J-1 visa holders who may be finding it difficult finding employment in the U.S., which is totally understandable in the current economic environment. The Fund will subsidize (or fully pay) the membership of IWT J-1 visa holders to influential Irish American business and cultural organizations in the U.S. Generally speaking, criteria for eligibility will depend on how long one has been seeking employment in the U.S., and a commitment from them to make full use of their membership by attending all of the organization's events, and proactively networking and volunteering for committees.

We thank those of you who have contributed to establishing this Fund which will have ZERO administrative costs i.e. the Fund will have no paid employees, hence all of your hard earned donations will be fully allocated to supporting those in need. However, at least initially, donations will not be solicited from the general population (inc. those of you on this mailing list) as we believe everyone has enough on their plates as it is, rather donations will be accepted on a discretionary basis from potential funders that we have relationships with. Overtime, we plan to expand the purpose of the Fund to include supporting other worthy causes, while always keeping administrative costs at zero.

We have to make sure that we support our next generation of business leaders by ensuring that our graduates gain valuable experience here in the U.S. which they can then bring back to Ireland to help put it back on track again as one of the most successful economies in Europe. We would like to sincerely thank the following business organizations in New York for supporting Failte 32 and the Shamrock Fund by offering us a special membership rate:

Irish Business Organization - www.IBO-NY.com

Irish International Business Network - www.IIBN.com,

Irish Network-NYC - www.IrishNetwork-NYC.com,

Irish Technology Leadership Group - www.ITLG.org,

By reducing the membership rate we pay, the above organizations, aside from the great networking for employment opportunities they provide, can help us serve more eligible candidates, and possibly pay their annual dues to more than one business or cultural organization.

Applications are currently being accepted from IWT J-1 visa holders in the New York area with Science, Engineering, Arts/History and Law qualifications. We are now asking all of you, particularly J-1 sponsors and support organizations, to spread the word. Please have them submit their request via the contact section on www.failte32.org, and indicate how long they have been seeking employment in the U.S., their field of study, and how they plan to utilize their membership. We will match suitable candidates with well established organizations in New York, such as those above, that can put them in front of potential employers.

We will begin reviewing applications this month, and will start placing eligible candidates in appropriate organizations towards the end of September.

As the Taoiseach (Irish Prime Minister), Mr. Enda Kenny, T.D., was recently quoted as saying in a speech he made at a Galway Chamber business luncheon back in Ireland "**We all need to pull together, we have a lot to offer and a lot going for ourselves**".

Kind regards

Failte 32 Committee

EXHIBIT 2

Darren S. Rimer

From: maurice landers [mauricelanders@yahoo.com]
Sent: 05/20/2014 4:36 PM
To: Darren S. Rimer
Subject: Fw: Shamrock Fund

[REDACTED]

[REDACTED]

Very best

Maurice

On Sunday, October 16, 2011 11:32 PM, maurice landers <mauricelanders@yahoo.com> wrote:

Dear Senator Mary Ann O'Brien and Jonathan Irwin,

It was recently brought to my attention that you are launching the Jack and Jill Shamrock Fund here in New York on October 24th.

I am one of the founding members of Failte 32 (www.failte32.org) which was set up last year to assist J-1 visa holders in finding employment in the U.S. It's a purely voluntary initiative that was organized by a few business people in the Irish American community in New York, with the support of over 20 affiliated Irish American organizations and numerous strategic partners, to try to assist our new arrivals by connecting them to Irish networks here in the U.S.

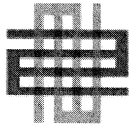
Failte 32 recently launched the **Shamrock Fund** SM to further its goal of actively connecting visa holders with Irish networks in the U.S. The launch was announced through our extensive contact list that includes business and community leaders in the Irish and Irish American community in New York and further afield, the Irish Govt., New York City and State Govt., academic institutions on both sides of the Atlantic, Irish American charitable organizations etc. Therefore, at the very least, the announcement of the launch of the **Shamrock Fund** SM would have been communicated to most of the main players in the Irish American community in New York.

We were thus quite surprised to hear about the launch of another fund in New York with the words "Shamrock Fund" in its name, almost a month to the day after we launched the **Shamrock Fund** SM. Therefore, I am interested in finding out what your intention is, as we have applied for registration of "Shamrock Fund" in NY state and thus there may be an issue that I'd like to discuss and resolve if need be before it's a bigger issue for everyone. We also own the shamrockfund.org domain name, and have filed an application for reservation of the "Shamrock Fund" corporate name with the New York State Department of State.

Thanking you sincerely for your attention to this matter. FYI, below is the Coalition of Irish Immigration Centers September newsletter featuring Fáilte 32 and the Shamrock Fund.

Kind regards

Maurice D. Landers



COALITION OF IRISH
IMMIGRATION CENTERS

September 2011

Coalition of Irish Immigration Centers Newsletter

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[Meeting with An Tánaiste](#)

[Chicago Immigration Success](#)

[Fáilte 32](#)

[Just for Fun](#)

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Dear Maurice,

Welcome to September's edition of the CIIC newsletter. What a busy month September turned out to be for the Coalition. There was a lot of activity around the various sub-committees and then of course there was An Tánaiste's visit which proved a great success. Full details are included in this month's newsletter.

Because of this, there will be no featured center this month but we promise to resume next month with San Francisco IIPC

There is an article in this month's newsletter about the actions of Cook County in Chicago in response to ICE's Secure Communities. It will be interesting to see if other Counties across the country will take their lead.

The feature on Fáilte 32 and their new fund to help IWT J-1 visa holders network within the Irish community is well worth considering. It is hoped that it is something that will draw a lot of interest and participation by IWT J-1 Visa Holders.

News from the Coordinator

Katie Fox



Phew! What a busy month (and it's not over yet). The return of most from vacation and the resumed work of all of the sub-committees made for an accelerated work-load growth over the past month. An Tánaiste's visit was then thrown in for good measure to ensure I stayed on my toes!!

Having said that, after working in a perceived vacuum in August it was nice to have people around off which to bounce ideas, get feedback etc. The meeting with An Tánaiste was very positive and I feel that the Coalition really exhibited its professionalism and left An Tánaiste in no doubt about the invaluable work that is being done on the ground by all of the centers and the commitment of those involved.

In terms of the sub-committees this month, some of my work included:

- Convening the Detention Sub-committee meeting. The two page Detention Handbook for Centers has been drafted and will be ready for circulation following a final edit. The Prison Visitation Guidelines will be ready for finalization at the next meeting. A decision on how a Prison Visitation Program will be rolled out and is for discussion at the next meeting.
- Working with the J1 Sub-committee on progressing some of the issues highlighted in previous meetings including - combating the negative press regarding J1 visa holders with accommodation providers & employers, ensuring better orientation of our Irish students before they come to the U.S. and working with the sponsoring bodies in Ireland to ensure a good partnership with the Immigration Centers here.
- Ensuring the approval of training and the rolling out of the Outcome Measures Initiative with the Boston Centers on Social Services and with Chicago and EIIC on Immigration.
- Finalizing the Request for Proposals and Budget for the Senior Helpline and then circulating it to the member centers. It is hoped that interested Centers will get their Proposals back before the 5th of October and a decision will be made soon thereafter.
- Convening the Fundraising sub-Committee. It was agreed that the full Board should attend the initial meeting to prioritize areas for funding and suggest an overall fundraising target.
- Circulating the Draft Fiscal Policies and Procedures for comment by the Board and drafting a budget for the next fiscal year. Approval will be sought from the Board regarding our fiscal year change to bring it in line with Department of Foreign Affairs funding.

There was a large degree of preparation for An Tánaiste's visit which ensured a cohesive and productive meeting with him. The CIIC were clear on the issues it wanted highlighted and what it was asking of An Tánaiste. This preparation made for a very successful meeting.

All in all, September proved to not only be a busy month, but a very productive one.

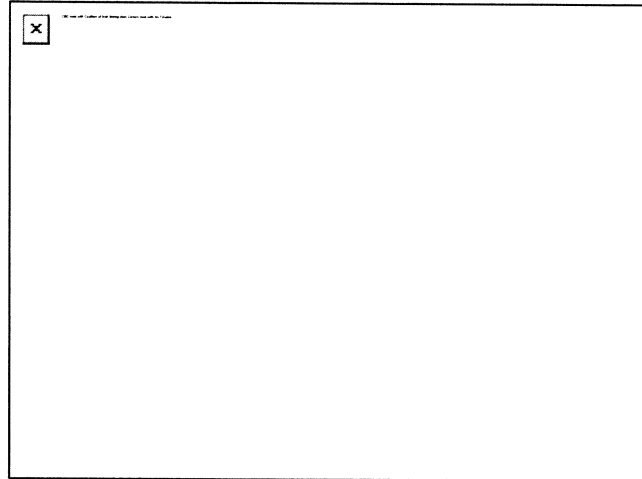
Coalition of Irish Immigration Centers meet with An Tánaiste & Minister for Foreign Affairs, Mr. Eamon Gilmore

While in New York on U.N. business, An Tánaiste and Minister for Foreign Affairs, Mr. Eamon Gilmore graciously took time out of his busy schedule to meet with the Coalition of Irish Immigration Centers to discuss the work of the member centers and the issues and concerns facing the Irish diaspora in the United States.

The Coalition highlighted the many issues faced by its member centers on a daily basis and presented on the various services provided by them to the Irish Community including immigration advice & support and social services. An Tánaiste showed an active interest asking pertinent and thought provoking questions throughout.

Immigration to the United States, the difficulties faced by the undocumented Irish and the need for future flow from Ireland led to a focused discussion. With Comprehensive Immigration Reform not on the cards for the foreseeable future, the Coalition asked An Tánaiste for his continued support for both CIR and a solution to address future flow. An Tánaiste is well aware of the issues and stated it as an ongoing discussion point between the Irish and American administrations.

CIIC President Siobhan Dennehy highlighted some the issues that arise from lack of immigration status - "Lack of immigration status is the basis for most of the workload of the Irish Centers across the country. Undocumented Irish immigrants suffer many social issues as a result of living life in the shadows including depression, drug & alcohol abuse, family issues,



Coalition of Irish Immigration Centers meet with
An Tánaiste, Mr. Eamon Gilmore, in NY
September 2011

detentions, deportations and long-term imprisonment. The CIIC appreciates the Irish government's continued support of the services provided by our member centers to the undocumented Irish and the government's continued work on their behalf."

The meeting was energetic and productive and the Coalition is grateful to An Tánaiste for his willingness to meet with them. It shows recognition by him for the important work being done by the centers in servicing the Irish Community in the U.S.

The meeting ended on a positive note and the Coalition is hopeful, economic climate withstanding, that An Tánaiste and the Department of Foreign Affairs will continue to fund and support the Coalition and its member centers as they continue to play an important role in the Irish Community here in the U.S.

Chicago Immigration Success

Cook County, the most populous county in the nation and home to

the City of big shoulders, Chicago, passed a historic pro-immigrant ordinance on Wednesday September 7th. The Cook County Board voted 10-5 to pass a simple, well-reasoned ordinance on immigration after hearing the arguments of the Chicago Celts for Immigration Reform and the Illinois Coalition for Immigrants and Refugee Rights (ICIRR).

The ordinance requires the Immigration and Customs Enforcement (ICE) agency to reimburse the County if it wants to hold people in county jails longer than local law allows. This is a historic victory for Cook County taxpayers, the rule of the law, and public safety. It will save the county \$15 million annually in a time of budget crisis in Illinois. It also means that people arrested for minor traffic incidents will no longer be held for ICE and heralds a victory for immigrant families who are still being separated by ICE in record numbers. It should be noted though that the ordinance relies on 5 separate safeguards to ensure no dangerous criminal is released.

Chicago has lead the way nationally on pro-immigrant issues, being the first city to draw over half a million immigrant advocates on to the street in a march calling for comprehensive immigration reform in 2006. This march encouraged other cities to follow suit and also set the scene for Chicago's famous politics to turn to immigration issues. The Chicago Celts for Immigration Reform have been at the forefront of moves to promote immigrant friendly policies and changes in legislation that respect our nation's rich immigrant history.

In addition to the Cook County ordinance, Illinois's Governor Pat Quinn recently withdrew from Immigration and Custom Enforcement's (ICE) Secure Communities program. The program would have seen state police collaborate with ICE to remove immigrants arrested by local authorities.

Quinn stated that Secure Communities was not on target with its mandate of identifying individuals who have been "convicted" of "serious criminal offenses," adding that in Illinois "more than 30 percent of those deported from the United States, under the program, have never been convicted of any crime" based on federal statistical data compiled through Feb. 28, 2011.

The governors of Massachusetts and New York quickly followed Illinois's lead and withdrew their states from Secure Communities.

However, as expected, anti-immigrant forces have already begun their backlash. The Sun-Times published a misleading article, falsely claiming that felons will not be handed over to ICE.

Anti-immigrant phone calls are coming in more than 2 to 1 in Commissioners' offices.

Breandán Magee, Executive Director of Chicago Irish Immigrant Support added, "The truth is that in addition to saving taxpayer dollars and defending the U.S. Constitution this bill restores faith between immigrant communities and the police. Chicago is setting a precedent that we hope can be replicated nationally; clearly the immigration debate has stalled on the national stage so we must take the fight to the state and local level".

Much work remains to be done if immigration reform is to be achieved federally but Chicago is holding the course and making a big difference on the ground. Let's hope that progressive legislative moves from states like Illinois surpass the negative Arizona style laws that have put the cause back decades

Fáilte 32

An Initiative for New Irish Arrivals in New York

Fáilte 32 is an initiative set up last year to help new arrivals from Ireland find employment in New York. It is hoped that by connecting them to all the influential Irish organizations in New York City it will put these new arrivals in front of potential employers and increase their chances of finding viable employment in the U.S.

Fáilte 32 recently launched the Shamrock Fund SM to further its goal of actively connecting visa holders with Irish networks in the U.S.

The Fund will subsidize (or fully pay) the membership of IWT J-1 visa holders to influential Irish American business and cultural organizations in the U.S. Criteria for eligibility includes how long one has been seeking employment in the U.S., and insists on a firm commitment from the IWT J1 visa holder to make full use of their membership by attending all of the organization's events, and proactively networking and volunteering for committees.

The fund will have ZERO administrative costs i.e. the Fund has no paid employees, hence all of the hard earned donations will be fully allocated to supporting those in need. Over time, the organizers plan to expand the purpose of the Fund to include supporting other worthy causes, while always keeping administrative costs at zero.

One of the co-founders of Fáilte 32, Maurice Landers stated

"We have to make sure that we support the next generation of Irish business leaders by ensuring that our graduates gain valuable experience here in the U.S. which they can then bring back to Ireland to help put it back on track again as one of the most

successful economies in Europe."

Four influential Irish organizations have already offered eligible candidates a special membership rate:

Irish Business Organization - www.IBO-NY.com
Irish International Business Network - www.IIBN.com
Irish Network-NYC - www.IrishNetwork-NYC.com
Irish Technology Leadership Group - www.ITLG.org

By reducing the membership rate, the above organizations, not only will provide great networking opportunities, but will also help the Shamrock Fund SM serve more eligible candidates, possibly paying their annual dues to more than one business or cultural organization.

Applications are currently being accepted from IWT J-1 visa holders in the New York area with Science, Engineering, Arts/History and Law qualifications.

Interested candidates should submit their request via the contact section on www.failte32.org and indicate; how long they have been seeking employment in the U.S; their field of study; and how they plan to utilize their membership.

The Fund will match suitable candidates with relevant organizations in New York to increase their chances of employment by providing networking opportunities with potential employers. The Fund started reviewing applications this month, and has already sponsored two IWT J-1 visa holders. Caro Kinsella is **Failte 32's** immigration attorney and she has been assisting them in this process.

Mr Landers added that An Taoiseach (Irish Prime Minister), Mr. Enda Kenny, T.D., was recently quoted at a Galway Chamber of Commerce luncheon back in Ireland as saying

"We all need to pull together, we have a lot to offer and a lot going for ourselves"

Fáilte 32 are certainly fulfilling that need in New York in assisting our new graduates to display what they have to offer to potential employers here in the United States.

For further information check out their website at

Just for Fun

Joke

An Irish turtle was walking down an alley in New York when he was mugged by a gang of snails. A police detective came to investigate and asked the turtle if he could explain what happened.

The turtle looked at the detective with a confused look on his face and replied "I don't know, it all happened so fast."

Trivia

Answers to last month's trivia questions are in red below:

1. What is the name of Frank McCourt's follow-up memoir to "Angela's Ashes"?

- a) A Monk Swimming
- b) Tara Road
- c) 'Tis

2. What is the largest county in Ireland?

- a) Dublin
- b) Cork
- c) Tipperary

3. What was Michael Collins' fiancée called?

- a) Kitty Kiernan
- b) Nora Barnacle
- c) Maude Gonne

This month's questions:

1. In 1951 which film was shot on location in Cong, County Mayo and directed by John Ford?

- a) The Quiet Man
- b) Darbie O'Gill & The Little People
- c) Ryan's Daughter

2. Who was the first High King of Ireland?

- a) Cúchulainn
- b) Brian Boru
- c) Tuatha Dé Danann

3. Which Irish musician now has a statue to him on Harry

Street off Grafton Street in Dublin?

- a) O'Carolan
- b) Bono
- c) Phil Lynott

The Coalition of Irish Immigration Centers (CIIC) is a national umbrella group for all of the Irish Immigration Centers in the US. The CIIC was established in 1996 to promote the welfare of Irish immigrants in the US at a national level.

If you wish to submit an article or highlight something going on in your center to this newsletter, please submit to katie.fox@ciic-usa.org before the 10th of the month.

Sincerely,

Coalition of Irish Immigration Centers

[Forward email](#)

EXHIBIT 3

Darren S. Rimer

From: maurice landers [mauricelanders@yahoo.com]
Sent: 05/21/2014 10:13 AM
To: Darren S. Rimer
Subject: Fw: Shamrock

[REDACTED]

[REDACTED]

Very best
Maurice

[REDACTED]

On Monday, October 17, 2011 5:10 AM, Jonathan Irwin <Jonathan@JackAndJill.ie> wrote:

Dear Maurice,

I got a signal via the Ireland Fund last week about Failte 32 & Shamrock Fund. To fill you in quickly we applied for the name on a worldwide basis in the Charitable Section some months ago after searches showed there were no other organisations with a similar name(which surprised us). Since that time our solicitors have received no objections. From my conversations last week I understood that you were about to apply for the name to be registered in New York State only.

We are using the name solely as an addition to The Jack and Jill Childrens Foundation to make the Irish Diaspora aware of the lack of funding and services for fragile babies provided by the State here in Ireland.

The last thing on our minds would be to discommode you in your efforts by causing any confusion for you. Our prescence in New York will be minimal ,unless we have another reception such as the one on 24th in Lily O'Briens I doubt the name will reappear as Jack and Jill is our banner. There is no intention to have a permament being in NYC.

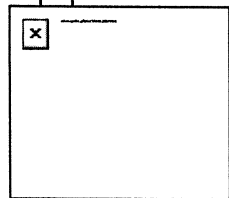
Kindest regards,

Jonathan

Jonathan Irwin
C.E.O.

Text Campaign. Text the word "PINT" to 57034. Cost €5 (Cost of a pint) Our children receive €4.95. Sláinte!

Help us today to raise funds by donating your old mobile phone, printer cartridges and computer equipment!



FREEPOST ADDRESS @ THE JACK AND JILL MOBILE APPEAL, FREEPOST, RATOATH ROAD, FINGLAS, DUBLIN 11 – 1850 52 55 45

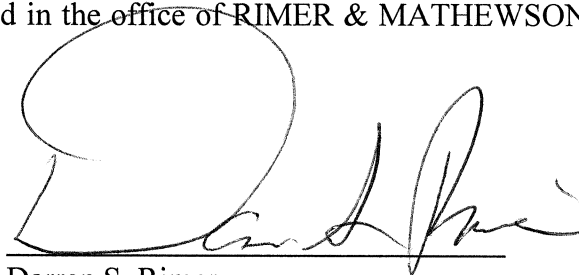
PROOF OF SERVICE

State of California)
) ss.
County of Orange)

I am over the age of 18 and not a party to the within action; my business address is 30021 Tomas, Suite 300, Rancho Santa Margarita, California 92688. On September 3, 2014, the attached **NOTICE OF OPPOSITION** was served on all interested parties in this action by U.S. Mail, postage prepaid, at the address as follows:

ROBERTO LEDESMA
LEWIS & LIN, LLC
45 MAIN STREET, SUITE 608
BROOKLYN, NY 11201

Executed on September 3, 2014. I declare under penalty of perjury that the above is true and correct. I declare that I am employed in the office of RIMER & MATHEWSON LLP at whose direction service was made.

A handwritten signature in black ink, appearing to read 'Darren S. Rimer', is written over a horizontal line.

Darren S. Rimer